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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF** **NEVADA**
9

10 KELLY-HARRISON, INC., an Oregon
11 corporation,

12 Plaintiff,

13 v.

14 WCM & ASSOCIATES, INC., a California
corporation,

15 Defendants.

16 WCM & ASSOCIATES, INC., a foreign
corporation,

17 Counterclaimant

18 v.

19 KELLY-HARRISON, INC. an foreign
corporation; DOES INDIVIDUALS I-X; and
20 ROE ENTITIES XI-XX,

21 Counter-defendants

22 WCM & ASSOCIATES, INC., a foreign
corporation,

23 Third-Party Plaintiff

24 v.

25 ARCH INSURANCE COMPANY, as Surety

Third-Party Defendant

Case No.: 2:24-cv-1752

**STIPULATION AND ORDER TO
EXTEND PROPOSED JOINT
DISCOVERY PLAN DEADLINE
(First Request)**

26 **STIPULATION AND ORDER TO EXTEND PROPOSED JOINT DISCOVERY PLAN**

27 **DEADLINE**

28 **(FIRST REQUEST)**

1 IT IS HEREBY STIPULATED AND AGREED by and between KELLY-HARRISON,
2 INC., and WCM & ASSOCIATES, INC., by and through their counsel request that the
3 Proposed Discovery Plan Deadline in this matter be extended pursuant to LR IA 6-1 and LR IA
4 6-2.

5 The parties hereby stipulate and agree to extend the deadline to submit their Proposed
6 Joint Discovery Plan Deadline to **January 8, 2025**. The prior deadline to submit the Proposed
7 Joint Discovery Plan Deadline was December 23, 2024; however, the parties were unable to
8 meet this deadline due to scheduling conflicts caused by the holiday season. These conflicts
9 have significantly limited the availability of both parties' counsel for the conference, and the
10 parties have been unable to coordinate a mutually convenient time to meet and hold the Rule
11 26(f) conference within the original timeframe.

12 **IT IS SO STIPULATED AND AGREED**


13
14 Dated: December 23, 2024

15 **DOBBERSTEIN LAW GROUP**

16
17 By: /s/ Quoc Thai
Eric Dobberstein, Esq.
Quoc Thai, Esq.
18 9480 S. Eastern Ave., Suite 225
Las Vegas, Nevada 89123
19 *Attorneys for Defendant and*
20 *Counterclaimant, and Third-party Plaintiff*

Dated: December 23, 2024

MEAD LAW GROUP LLP

21
22 By: 
Leon F. Mead II, Esq.
M. Dason Coronado, Esq.
23 7251 W Lake Mead Blvd., Suite 460
Las Vegas, Nevada 89128
24 *Attorneys for Plaintiff Kelly-Harrison, Inc.*

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28 IT IS SO ORDERED.
Dated: December 27, 2024


Nancy J. Koppe
United States Magistrate Judge